

MATTHEW G. MONFORTON
Montana State Bar No. 5245
MONFORTON LAW OFFICE, PLLC
32 Kelly Court
Bozeman, Montana 59718
Telephone: (406) 570-2949
Facsimile: (406) 551-6919
E-mail: matthewmonforton@yahoo.com

DAVID P. CLAIBORNE
[Idaho State Bar No. 6579]
SAWTOOTH LAW OFFICES, PLLC
Golden Eagle Building
1101 W. River St., Ste. 110
Boise, Idaho 83702
Telephone: (208) 629-7447
Facsimile: (208) 629-7559
E-mail: david@sawtoothlaw.com

Attorneys for Applicants for Intervention

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
(MISSOULA DIVISION)

**CENTER FOR BIOLOGICAL
DIVERSITY, et al.,**

Plaintiffs,

vs.

DEB HAALAD, et al.,

Defendants;

and

Lead Case No. CV 20-181-M-DWM

Member Case No. CV 20-183-M-DWM

**MOTION FOR *PRO HAC VICE*
ADMISSION OF DAVID P.
CLAIBORNE**

STATE OF IDAHO, an Idaho
nonprofit corporation;

Defendant-Intervenor;

and

**IDAHO STATE SNOWMOBILE
ASSOCIATION, INC.**, an Idaho
nonprofit corporation; **IDAHO
RECREATION COUNCIL, INC.**, an
Idaho nonprofit corporation;
**COLORADO SNOWMOBILE
ASSOCIATION**, a Colorado nonprofit
organization; **BACKCOUNTRY
SLED PATRIOTS**, a Montana
nonprofit organization; **CITIZENS
OFR BALANCED USE**, a Montana
nonprofit organization; **UNITED
SNOWMOBILE ALLIANCE**, a New
Hampshire nonprofit organization;
**AMERICAN COUNCIL OF
SNOWMOBILE ASSOCIATIONS**, a
Michigan nonprofit organization; **OFF
ROAD BUSINESS ASSOCIATION**,
a California nonprofit organization;
**COLORADO OFF HIGHWAY
VEHICLE COALITION**, a Colorado
nonprofit organization; **TRAILS
PRESERVATION ALLIANCE**, a
Colorado nonprofit organization;
**UNITED FOUR WHEEL DRIVE
ASSOCIATION**, a California
nonprofit organization;
**CLEARWATER COUNTY BOARD
OF COMMISSIONERS**, a political
subdivision of the State of Idaho;
**IDAHO COUNTY BOARD OF
COMMISSIONERS**, a political
subdivision of the State of Idaho;

BONNER COUNTY BOARD OF COMMISSIONERS, a political subdivision of the State of Idaho;
VALLEY COUNTY BOARD OF COMMISSIONERS, a political subdivision of the State of Idaho;
ADAMS COUNTY BOARD OF COMMISSIONERS, a political subdivision of the State of Idaho;
LINCOLN COUNTY BOARD OF COMMISSIONERS, a political subdivision of the State of Montana;
MINERAL COUNTY BOARD OF COMMISSIONERS, a political subdivision of the State of Montana;
RAVALLI COUNTY BOARD OF COMMISSIONERS, a political subdivision of the State of Montana;

Applicants for Intervention.

Under Local Rule 83.1(d), I, Matthew G. Monforton, counsel for Intervenor-Applicants – **IDAHO STATE SNOWMOBILE ASSOCIATION, INC.**, an Idaho nonprofit corporation; **IDAHO RECREATION COUNCIL, INC.**, an Idaho nonprofit corporation; **COLORADO SNOWMOBILE ASSOCIATION**, a Colorado nonprofit organization; **BACKCOUNTRY SLED PATRIOTS**, a Montana nonprofit organization; **CITIZENS OFR BALANCED USE**, a Montana nonprofit organization; **UNITED SNOWMOBILE ALLIANCE**, a New Hampshire nonprofit organization; **AMERICAN COUNCIL OF SNOWMOBILE ASSOCIATIONS**, a Michigan nonprofit organization; **OFF**

ROAD BUSINESS ASSOCIATION, a California nonprofit organization;
COLORADO OFF HIGHWAY VEHICLE COALITION, a Colorado nonprofit organization; **TRAILS PRESERVATION ALLIANCE**, a Colorado nonprofit organization; **UNITED FOUR WHEEL DRIVE ASSOCIATION**, a California nonprofit organization; **CLEARWATER COUNTY BOARD OF COMMISSIONERS**, a political subdivision of the State of Idaho; **IDAHO COUNTY BOARD OF COMMISSIONERS**, a political subdivision of the State of Idaho; **BONNER COUNTY BOARD OF COMMISSIONERS**, a political subdivision of the State of Idaho; **VALLEY COUNTY BOARD OF COMMISSIONERS**, a political subdivision of the State of Idaho; **ADAMS COUNTY BOARD OF COMMISSIONERS**, a political subdivision of the State of Idaho; **LINCOLN COUNTY BOARD OF COMMISSIONERS**, a political subdivision of the State of Montana; **MINERAL COUNTY BOARD OF COMMISSIONERS**, a political subdivision of the State of Montana; **RAVALLI COUNTY BOARD OF COMMISSIONERS**, a political subdivision of the State of Montana – and hereby respectfully move for the admission of attorney David P. Claiborne *pro hac vice* before this Court. Mr. Claiborne’s contact information is as follows:

David P. Claiborne (Id. State Bar No. 6579)
Sawtooth Law Offices, PLLC
1101 W. River Street, Suite 110
Boise, Idaho 83702

Phone : (208) 629-7447

Email: david@sawtoothlaw.com

Mr. Claiborne's declaration in support of this motion is filed herewith.
Pursuant to Local Rule 7.1(c)(1), the other parties in this matter have been contacted about this motion and all have indicated they have no opposition.

Oral argument on this Motion is not requested.

DATED this 30th day of August, 2021.

MONFORTON LAW OFFICES, PLLC

by: /s/ Matthew G. Monforton
Matthew G. Monforton

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on the following on this 30th day of August, 2021, by the following method:

AMANDA DALMENDRAY GALVAN
TIMOTHY J. PRESO
EARTHJUSTICE LEGAL DEFENSE
FUND – BOZEMAN

313 East Main Street

Bozeman, MT 59715

Telephone: (406) 586-9699

Facsimile: (406) 586-9695

Email: agalvan@earthjustice.org;

tpreso@earthjustice.org

*Attorneys for Center for Biological Diversity,
Conservation Northwest, Defenders of
Wildlife, Friends of the Clearwater, Greater
Yellowstone Coalition, Idaho Conservation
League, Jackson Hole Conservation Alliance,
Klamath-Siskiyou Wildlands Center, Rocky
Mountain Wild and Sierra Club*

☐ U.S. First Class Mail, Postage Prepaid

☐ U.S. Certified Mail, Postage Prepaid

☐ Federal Express

☐ Hand Delivery

☐ Facsimile

☒ iCourt / Electronic Mail or CM/ECF

KAMELA A. CASCHETTE

RANDY J. TANNER

U.S. DEPARTMENT OF JUSTICE

Environmental & Natural Resources Div.

Ben Franklin Station

PO Box 7611

Washington, DC 20044-7611

Telephone: (202) 305-0340

Facsimile: (202) 305-0275

Email: kamela.caschette@usdoj.gov;

randy.tanner@usdoj.gov

*Attorneys for Scott de la Vega, Martha
Williams, United States Fish and Wildlife
Service*

☐ U.S. First Class Mail, Postage Prepaid

☐ U.S. Certified Mail, Postage Prepaid

☐ Federal Express

☐ Hand Delivery

☐ Facsimile

☒ iCourt / Electronic Mail or CM/ECF

**OWEN H. MORONEY
IDAHO OFFICE OF THE ATTORNEY
GENERAL**

2117 North 17th Street

Boise, ID 83702

Telephone: (208) 287-2875

Facsimile (208) 334-2148

Email: owen.moroney@idfg.idaho.gov

Attorneys for State of Idaho

☐ U.S. First Class Mail, Postage Prepaid

☐ U.S. Certified Mail, Postage Prepaid

☐ Federal Express

☐ Hand Delivery

☐ Facsimile

☒ iCourt / Electronic Mail or CM/ECF

MONFORTON LAW OFFICES, PLLC

by: /s/ Matthew G. Monforton
Matthew G. Monforton